



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

January 19, 2010

Mr. John T. Carlin  
Vice President R.E. Ginna Nuclear Power Plant  
R.E. Ginna Nuclear Power Plant, LLC  
1503 Lake Road  
Ontario, NY 14519

**SUBJECT: CORRECTION LETTER TO ALTERNATIVE REQUESTS FOR FIFTH 10-YEAR PUMP AND VALVE INSERVICE TESTING PROGRAM - R.E. GINNA NUCLEAR POWER PLANT (TAC NOS. ME2232, ME2233, ME2234, ME2235, ME2236, ME2237, ME2238, AND ME2239)**

Dear Mr. Carlin:

By letter dated December 30, 2009, the Nuclear Regulatory Commission (NRC) authorized proposed alternatives PR-01, PR-02, GR-02, GR-03, VR-01, and VR-02 for the fifth 10-year interval inservice testing program at the R.E. Ginna Nuclear Power Plant.

Your staff recently informed us of an error in the NRC staff's safety evaluation (SE) supporting proposed alternative PR-02 regarding the Group A (Preferred) and Group B (Standby) motor driven auxiliary feedwater (AFW) pumps. As described in your submittal dated September 11, 2009, vibration measurements are only performed during quarterly testing of the Group A AFW pumps. However, our SE inadvertently stated that vibration measurements would be performed during both Group A and Group B AFW pump testing. Enclosed are replacement pages for the NRC SE for PR-02 that clearly states that vibration measurements will only be performed during Group A AFW pump testing.

Please contact me at 301-415-1364 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Douglas V. Pickett".

Douglas V. Pickett, Senior Project Manager  
Plant Licensing Branch I-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-244

Enclosure:  
As stated

cc w/encl: Distribution via Listserv

The licensee states:

The Auxiliary Feed Water (AFW) pumps each have a minimum flow path that can be utilized for the respective Group A and Group B pump tests. The minimum flow lines provide a fixed resistance flow path from the pump discharge to the condensate storage or test tank then back to the suction of each pump. However, the minimum flow lines are not provided with flow instrumentation.

The performance of pump tests using a fixed resistance flow path is an acceptable alternative to the Code requirements per NUREG-1482, Rev. 1, Section 5.9, "Pump Testing Using Minimum Flow Return Lines With or Without Flow Measuring Devices." During the performance of quarterly pump testing, pump differential pressure will be measured and trended. This provides a reference value for differential pressure that can be duplicated during subsequent tests. This methodology provides for the acquisition of repeatable differential pressure, which is an adequate means of monitoring for pump degradation.

Concerns identified in NRC Bulletin 88-04, "Potential Safety Related Pump Loss," with regard to minimum recirculation flow line sizing have been assessed and verified to not be of concern during pump testing.

Therefore, the current testing protocol which has the potential for service water intrusion and requires a reactivity change, and the cost of installing either temporary or permanent flow instrumentation imposes an undue burden without a compensating increase in the level of quality and safety.

### 3.2.3 Licensee's Proposed Alternative Testing (as stated)

Quarterly testing of the designated Group A AFW pumps (PAF01A, PAF01B) will be performed on minimum flow recirculation measuring differential pressure across the pump and measuring vibration in accordance with ASME OM Code-2004, ISTB-5121 and NUREG-1482, Rev. 1, Section 5.9, "Pump Testing Using Minimum Flow Return Lines With or Without Flow Measuring Devices," for guidance.

Quarterly testing of the designated Group B AFW pumps (PSF01A, PSF01B) will be performed on minimum flow recirculation measuring differential pressure across the pump in accordance with ASME OM Code-2004, ISTB-5122 and NUREG-1482, Rev. 1 Section 5.9, "Pump Testing Using Minimum Flow Return Lines With or Without Flow Measuring Devices" for guidance.

The proposed alternative testing provides reasonable assurance that the AFW pumps will be operationally ready.

### 3.2.4 Staff Evaluation

Motor-driven AFW pumps PAF01A and PAF01B are Group A centrifugal pumps. Inservice testing requirements for Group A centrifugal pumps are specified in ASME OM Code ISTB-5121.

Motor-driven AFW pumps PSF01A and PSF01B are Group B centrifugal pumps. Inservice testing requirements for Group B centrifugal pumps are specified in ASME OM Code ISTB-5122.

The licensee proposes alternative quarterly testing for the motor-driven auxiliary feedwater pumps. The current configuration does not meet ASME OM Code requirement ISTB-3550 which states that when measuring flow rate, a rate or quantity meter shall be installed in the pump test circuit. The licensee proposed alternative quarterly test shall use the minimum flow path lines which provide a fixed resistance flow path without installed flow rate instrumentation. Measurements will include differential pressure across the pump and vibration in accordance with ASME OM Code-2004, ISTB-5121 for Group A pumps and differential pressure across the pump in accordance with ASME OM Code-2004 ISTB-5122 for Group B pumps.

The NRC staff has reviewed the licensee's proposed alternative and has determined that the testing is consistent with the guidance in NUREG-1482, Revision 1, Section 5.9, "Pump Testing Using Minimum Flow Return Lines With or Without Flow Measuring Devices," and GL 89-04, "Guidance On Developing Acceptable Inservice Testing Programs," Position 9. The staff concludes that the proposed alternative provides an acceptable level of quality and safety.

### 3.3 Request GR-02

#### 3.3.1 ASME OM Code Requirements:

ISTA-3130(b) (Application of Code Cases) states that code cases be applicable to the edition and addenda specified in the test plan.

ISTC-3100(a) (Preservice Testing) states that any valve that has undergone maintenance that could affect its performance after the preservice test be tested in accordance with ISTC-3310.

ISTC-3310 (Effects of Valve Repair, Replacement, or Maintenance on Reference Values) states that a new reference value be determined or the previous reference value be reconfirmed by an inservice test after a valve has been replaced, repaired, or has undergone maintenance that could affect the valve's performance.

ISTC-3510 (Exercising Test Frequency) states that active Category A and B valves be exercised nominally every 3 months.

ISTC-3521(d) (Category A and Category B Valves) states if exercising is not practicable during operation at power and full-stroke during cold shutdowns is also not practicable, it may be limited to part-stroke during cold shutdowns, and full-stroke during refueling outages.

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Your staff recently informed us of an error in the NRC staff's safety evaluation (SE) supporting proposed alternative PR-02 regarding the Group A (Preferred) and Group B (Standby) motor driven auxiliary feedwater (AFW) pumps. As described in your submittal dated September 11, 2009, vibration measurements are only performed during quarterly testing of the Group A AFW pumps. However, our SE inadvertently stated that vibration measurements would be performed during both Group A and Group B AFW pump testing. Enclosed are replacement pages for the NRC SE for PR-02 that clearly states that vibration measurements will only be performed during Group A AFW pump testing.

Please contact me at 301-415-1364 if you have any questions.

Sincerely,  
*/RA/*  
Douglas V. Pickett, Senior Project Manager  
Plant Licensing Branch I-1  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-244

Enclosure:  
Safety Evaluation

cc w/encl: Distribution via Listserv

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